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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF MOLLY JENNINGS  
IN SUPPORT OF META PLATFORMS,  
INC.'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL**

Judge: Hon. James Donato

1 I, Molly Jennings, declare as follows:

2 1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I represent Meta  
3 Platforms, Inc. in the above-captioned action. I have personal knowledge of the matters stated  
4 herein and, if called upon, I could and would competently testify thereto.

5 2. Pursuant to Local Rule 79-5, I submit this Declaration in support of Meta's  
6 Administrative Motion to File Under Seal certain exhibits to the Supplemental Declaration of  
7 David Z. Gringer in support of Meta's Motion to Exclude Testimony of Nicholas Economides.

8 3. As will be discussed in a "more fulsome and revised motion to seal" after the  
9 completion of briefing pursuant to Paragraph 31 of this Court's Standing Order for Civil Cases,  
10 Meta's Motion to Exclude Testimony of Nicholas Economides and the accompanying exhibits,  
11 including certain exhibits to the supplemental Gringer Declaration, include information that Meta  
12 designated as "Confidential" or "Highly Confidential" under the Stipulated Protective Order,  
13 Dkt. 314, which, if revealed to competitors or counterparties, could cause competitive harm to  
14 Meta.

15 4. Attached to this declaration are unredacted versions of the accompanying  
16 exhibits.

17 5. Pursuant to Paragraph 31 of the Court's Standing Order for Civil Cases, Meta will  
18 file a combined Motion to Seal promptly after briefing on the Motions is complete and will work  
19 in good faith to minimize the amount of material sought to be sealed to ensure it is narrowly  
20 tailored in light of the right of public access to the record.

21 I declare that the foregoing is true and correct under penalty of perjury.

22 Executed on this 18th day of September, 2023, in Washington, D.C.

23  
24 By: /s/ Molly M. Jennings  
25 Molly M. Jennings  
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